Proceeding: IN THE MATTER OF TELECOMMUNICATIONS RELAY SERVICES AND SPE Record 1 of 1
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Submission Type: CO Submission Status: ACCEPTED Viewing Status: UNRESTRICTED
Subject:
DA Number: Exparte Late Filed: File Number: 1
Calendar Date Filed: 09/13/1998 11:21:53 PM Date Disseminated: Filed From: EMAIL
Official Date Filed: 09/14/1998 Date Released/Denied: Initials:
Confirmation # Date Filed:

DOCKET FILE COPY ORIGINAL

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

9/14/98

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Comments regarding FCC's TRS NPRM (CC Docket No. 98-67):
Please accept this late submission of comments on NPRM No. 98-67 = regarding telecommunications relay services (TRS). I heard for the first = time about this proposal at the ALDA convention in Chicago over Labor = Day weekend. Although I am incredibly grateful for the existence of = TRS, I am also painfully aware of the present system's shortcomings and = how much better it could be.

My "qualification" for making these comments is that I use TRS = extensively, primarily for my job in a large social service agency. I = use voice carryover (VCO) exclusively, because my progressive hearing = loss has not affected my speech, and I find it faster and somewhat more = natural. Because I almost always make my first contact with clients by = phone, the performance of my local relay service is an extremely = important professional issue for me. If the call does not go well, this = is likely to enter into their first impressions of me and my agency.

Section and paragraph numbers below refer to the text of the NPRM as = downloaded from the FCC's Internet site. I have tried, where possible, = to also refer to the section number of the actual proposed rule.

IIIA: "IMPROVED" TRS
STS, MRS, VRI, and other "improvements" (#s 1-4):

While I generally agree with FCC's suggestions for the incorporation of = STS, MRS, and VRI services, and the accompanying change in the wording = of the definition of the CA's role, I respectfully echo those who = expressed regret that these are the only two "improved" TRS services = being considered at this time. Perhaps not at this point in the = process, but certainly the next time changes in TRS are being = considered, a broader look at "improvements" in services is needed.

The most important improvement to me would be anything that increases = speed, to make relay calls a closer "functional equivalent" of voice = calls. Having spent part of my professional life being able to make = voice calls and part of it dependent on TRS, I can assure you that relay = calls, even with VCO, are still nowhere near a "functional equivalent". = Technologies that exist right now can be used to increase speed, as = Ultratec has pointed out: most noticeably Turbo Code, which is = preferred by many TTY-to-TTY callers, and various voice-to-text programs = that could be trained to the CA's voice. While the FCC cannot mandate = the use of a particular software, it can mandate increased speed, by = whatever means the local relay service chooses. Turbo Code is such an = obvious one that I still do not understand why it is not used routinely = now.

Increasing speed would have several important effects. First, it would = bring the pace of conversation closer to a "functional equivalent" as = mandated by the ADA. Secondly, it would improve the public reaction to = TRS in the hearing population. A common theme in many of the rude = comments I get (and yes, I get many) is that "these [relay] calls take = forever". Thirdly, increased speed would improve access to voice = menu-driven calls, making further accommodations in that realm = unnecessary. Fourth, faster, more efficient relay services would make = hearing-impaired workers like myself more productive in jobs that = involve extensive phone work, and increase the range of employment = opportunities.

Emergency Services (#5):
I agree with those who suggest that ANI transmission and uniformity in =
the handling of emergency relay calls should be mandated. I think it =
would also be highly worthwhile to consider setting up a second, =
three-digit relay number for emergencies only, to parallel 9-1-1 =
services for the hearing. The use of a second line (which would still go =
to the same relay center) could alert the relay center to the presence =
of an emergency call before the CA even picks it up. This could be =
especially important in relay centers that use some sort of automated =
call answering for routine relay calls, to ensure that emergency calls =
will be answered immediately. The use of a separate emergency number, =
coupled with uniform emergency-call protocols, could greatly improve =
service. I leave the question of whether this is technically feasible =
to those in the industry.
Enhanced services (#6):
Again, I would like to respectfully echo SHHH's and others' insistence =
on "functional equivalence" here. This is especially important to me, =
for both personal and professional calls, in the area of voice-menu =
operated systems. I agree with FCC's suggestion that the CA should be =
given the option of asking the TRS user if s/he wants verbatim or a =
summary, and if s/he is looking for something in particular. I often =
instruct the CA to do this when I know in advance that I'm going to get =
an automated answering system. It is not always possible, however, to =
know in advance that I am going to encounter such a system, and/or which =
option from the menu I will want to select, especially in very complex =
systems where there are multiple levels of choice. These systems are =
becoming increasingly prevalent and, I believe, require the type of =
"evolution" in TRS services that Congress intended, to match the pace of =
changing technology. I think that the best long-range resolution of =
this particular problem would be improved speed, as discussed above.
I don't call 900 numbers so I really have no opinion on this issue. I =
would be hard pressed, however, to see them as part of the "mainstream" =
of telecommunications that we should be entitled to access to.
IIIB. MANDATORY MINIMUM STANDARDS
Speed of answer (#1):
I strongly support FCC's decision to institute a 10-second maximum wait =
time, and appreciate the clarification that this must be 10 seconds =
until a "real" CA answers ready to process the call. I have had =
considerable trouble having to wait for calls to be processed, =
especially after I request VCO. I would suggest that FCC make it clear =
that this applies to VCO and HCO calls too, perhaps making the 10 =
seconds start at the point at which VCO or HCO is requested.
To AT&T (my state's TRS provider, incidentally), GTE, and others who =
insist that the 10-second maximum wait is not realistic in terms of =
cost, I ask, where are their data? I would not believe their claims =
unless I saw hard numbers proving that such a regulation would unduly =
increase cost. =20
CA Quality (#2):
Rather than insisting on a set typing speed, I feel that it would be =
more realistic and effective for the FCC to consider mandating an =
overall speed of transmission. As mentioned in my discussion of the =
need for increased speed above, state relay providers could be free to =
choose whatever means or technology -- Turbo Code, CA's who type faster, =
voice recognition software, CART, etc. -- would enable them to meet the =
speed requirement. This is an issue of overall system quality rather =
than individual CA quality.
I do feel that there should be a more efficient and publicized means for =

consumer reporting of problems with individual CA's; my thoughts on this =
subject appear in my comments on Part IIID, Enforcement and =
Certification, later in this letter. =20
In-call CA replacement (#3):
May I heartily add my support for the rule that a CA must stay with a =
call for at least 10 minutes, and be given the option of finishing up a =
call if s/he feels it would result in better service. I once went =
through two changes in CA during one 30-minute phone call, which did not =
help in making the person I was trying to get some important information =
any more cooperative. Incidentally, I think that TRS providers should =
be given some sort of incentive to find a way to make relay calls =
interactive (so that each person can interrupt the other); I know from =
experience that if this were possible, some of my phone calls would not =
be so long! Again, I would ask those providers who voiced their dissent =
to provide reliable statistics supporting their claims that adoption of =
this rule would be detrimental to employee productivity and the =
maintenance of fair work schedules.
Other standards:
Under Section 64.604, two requirements stand out in my mind as not being =
followed and in need of enforcement if adopted. Under Technical =
Standards (b) (1), it is stated that "TRS shall be capable of =
communicating with ASCII and Baudot format, at any speed generally in =
use". To me, this would imply that Turbo Code, a form of Baudot, should =
be mandated when appropriate. I did not see any reference to Turbo Code =
elsewhere in the NPRM, and remain puzzled about this. As stated before, =
Turbo Code appears to me to be a necessity.
Secondly, under Functional Standards (c) (2), Public access to =
information, it is stated that TRS carriers should inform the public =
about TRS through their phone directories and periodic billing inserts, =
including the listing of TT numbers in regular phone directories. I =
hope that all of this will actually happen someday! NONE of it is =
happening in the state of Illinois right now. I learned almost =
everything I know about TRS from Hitec Group, when I bought my Uniphone =
(a combination TTY/phone) from them. As I stated earlier, the ONLY =
information I ever received from my TRS provider was about user =
profiles. And many people with whom I have come into contact via TRS =
comment on the lack of public awareness of this service and their =
frustration at not understanding it at first.
IIIC: COMPETITION ISSUES
I generally agree with the FCC's proposals on multivendoring (#1). If, =
in time, regular voice phone service switches to multivendor =
arrangements for intrastate calls, I believe that would be the =
appropriate time to seriously consider multivendoring TRS. On the =
subject of transfer of customer profile information when the provider =
changes (#2), I understand the industry's wish for this to remain =
proprietary information, but I would ask that states be required to =
inform all TRS users when the provider changes and alert them to the =
need to submit new customer profiles to the new provider.
IIID: ENFORCEMENT AND CERTIFICATION ISSUES
I hope that FCC will strongly emphasize the proposed changes to Section =
64.605, State Certification (b) (2), requiring TRS providers to have =
adequate complaint-handling procedures AND make them well-known and =
understood by TRS users. In the 2 years that I have been using my =
state's TRS, both personally and professionally, I have received exactly =
one piece of mail from the provider (AT&T). It was an announcement of =
the "new" feature of customer profiles. If they have a complaint filing =
procedure I wouldn't even know that it existed, and I have many =

complaints that I'd like to file if I knew what to do.
I feel very strongly that the greatest weaknesses of today's TRS are 1) = lack of consumer input, and 2) lack of quality control. Consumers are = the best source of knowledge about what really happens during relay = calls, and how often. In an industry that is so new and so rapidly = evolving, I would expect consumer satisfaction research to be heavily = invested in; to my knowledge, TRS providers have conducted none. I am = sure that many consumers, like myself, would be happy to participate in = research in the form of logging relay calls for a set period and = reporting trends and problems. I may begin to do this on my own just to = see if some of the problems I experience frequently are due to specific = CA's rather than the system as a whole.
Providers as well as advocacy groups make all sorts of statements = regarding what "usually" happens, but rarely have statistics to back = them up. GTE's assertion that the rule requiring CA's to stay with a = call for at least 10 minutes is "unnecessary" because the "average" call = is four minutes is a glaring example. Where are the data to back up = these claims? Sprint's brief study of the time it took for VCO calls to = be placed is a laudable step, especially as it resulted in a change in = service. The extent to which the FCC should become involved in this = quivalence". TRS calls, as they exist today, are not like normal = conversation and take some getting used to. Many potential TRS users = are being denied "functionally equivalent" access to telephone service = either out of unawareness of the existence of TRS, or discouragement = with the lack of understanding in the general public. The FCC cannot = mandate a change in attitude, but it can help ensure that lack of = information is not responsible for negative attitudes or low use of TRS = by those who need it.

I would hope that the FCC will continue to look at readily achievable = changes in TRS after the present rules and amendments are adopted or = discarded. There is so much more to be examined. I hope that increased = efforts will be made to make individual TRS users more aware of pending = NOIs, NPRMs, and such, and solicit comments from them. It is we, the = individual users, who depend on TRS to enhance the quality of our = personal and professional lives, and have the greatest investment in = seeing improvements made. Thank you for your time and consideration.